

Removing Mercury-- Asbestos Contaminated Material from the CFA-674 Pond (Operable Unit 4-05)

Response to Comment Document

***Note:** Ms. Romriell of Pocatello, Idaho, talked with Reuel Smith of the INEL Community Relations Plan Office on July 20, 1994 after seeing the Notice of Availability display ad regarding the removal action at the CFA-674 pond area (Operable Unit 4-05) that appeared in the Idaho State Journal.*

Summary of Telephone Call Conversation with Ms. Romriell:

During the phone conversation, Ms. Romriell related a personal experience concerning leaving asbestos based roofing material in place, rather than removing it from their family business at great expense. She asked that DOE consider leaving the asbestos based material described in the ad in place to save government money. Ms. Romriell was opposed to removing asbestos based roofing materials from the CFA-674 pond removal action site.

DOE Response:

The DOE concurs with the point of Ms. Romriell's comment. DOE plans to excavate some of the asbestos based material where it has to be disturbed to remove other contaminants noted in the display ad, but will leave in place asbestos based material that does not have to be disturbed. Precautions will be taken to ensure that workers and the public are protected.

During the initial investigation of CFA-674 pond asbestos based roofing material was found to be exposed at the surface of the pond. The asbestos was thought to have been disposed in proximity to calcine, another material targeted to be removed during this removal action. In order to remove the calcine, the asbestos would have to be disturbed. The tar base of the asbestos based roofing material exposed at the land surface appeared to be in weathered condition making the asbestos friable. The DOE decided to remove this material along with mercury contaminated calcine.

It was assumed that only minor amounts of the asbestos based roofing material would be found and removed (approximately 10 cubic yards). However, as the removal activities progressed, it became evident that the site contained significantly more asbestos than planned and budgeted for removal. Approximately 75 cubic yards of non friable, buried asbestos roofing material was removed and stockpiled on site to gain access to the mercury containing calcine. Approximately 4 cubic yards of asbestos based roofing material, exposed at the surface and containing significant quantities of friable asbestos was removed, double bagged and boxed. The boxed friable asbestos will be sent to the CFA landfill for proper disposal. However, the majority of the asbestos will be left at the site. This includes the 75 or so cubic yards that have been disturbed to gain access to the calcine and all remaining roofing material that has not been unearthed. The material that has been disturbed will be covered with at least two feet of fill soil. The entire area will be posted with warnings regarding subsurface roofing materials containing asbestos.